

A background image showing two hands shaking, symbolizing partnership or agreement. The image is in a dark blue, semi-transparent style.

↑partnermedia

Code of Ethics

April 2023

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A scenic landscape featuring a bright sun in a blue sky with scattered white clouds. Below the sky, there are rolling green hills and mountains covered in dense evergreen forests. In the foreground, a paved asphalt road with white lane markings stretches across the frame.

1. FINALIDAD

This Code of Ethics reflects the commitment of UPartner Media to a set of principles and values that should warrant responsible behavior that is fully respectful of current legislation.

Letter from the management committee

"UPartner Media is a young agency but, since its beginning, all of us have been committed to the fulfillment of the highest standards in business practice. This commitment is integral to our corporate culture and philosophy as it is to the strong values that underpin our way of doing business and of relating to our environment".

**Management committee
UPARTNER MEDIA**



UPartner Media's Code of Ethics is the basis of our conduct and is the foundation of all our policies, procedures and guidelines. It serves as a guideline for the personal and professional behavior of all the people who are part of our organization, as well as the rest of the people and companies that collaborate and interact with us in the development of our activities.

This commitment to ethics and doing the right thing is not an option. No particular business circumstance can be used as a justification to act outside the law or to behave in a manner contrary to our values and ethical standards. Everyone at UPartner Media must assume and promote the values and principles set forth in this Code of Ethics, and this responsibility is even more relevant for the people who are part of the company's management, who must be a reference and a role model to inspire the rest of the organization.

This text has been approved by the Management Committee and I invite all those interested in it to read it carefully and to apply it in its integrity in the performance of their responsibilities, in order to contribute and strengthen UPartner Media being a reference in the market.

**Management committee
UPARTNER MEDIA**



Scope and Term

UPartner Media's Code of Ethics is an ethical framework that will serve as a guide for all of the company's business relationships with its employees, customers, suppliers and society in general. It applies to all company personnel, including managers, employees, collaborators and suppliers.

It also extends to all customers and business partners with whom we interact in the performance of our activities. It is the responsibility of each person who is part of UPartner Media to know and comply with this code, as well as to report any violation of this code of which he or she becomes aware.

Each member of the company is responsible for its compliance and dissemination through his or her daily behavior and actions. In this way, we will ensure an ethical and responsible business conduct that will allow us to grow in a sustainable manner and contribute to the development of our environment.

The Code of Ethics is not and does not pretend to be exhaustive. Therefore, situations not covered in it will be resolved in accordance with the criteria of best management and corporate governance practices. This Code is effective as of its approval in April 2023. Additional topics arising from various situations in our business and the dynamics of the environment in general will be incorporated into this text if and when necessary.

Objectives



1. Guide the way in which we act

Establish the criteria that define the relationships between all the actors involved in our area of action and publicize the UPartner Media Ethics Line, through which any behavior, non-compliance or practice that does not adhere to the provisions of this Code and the rest of the internal guidelines can be reported

2. Publicly affirm our responsibilities

This reflects the responsibilities of the company's managers, employees and collaborators in complying with and enforcing this Code of Ethics, which, together with UPartner Media's other internal guidelines, forms part of our corporate governance system.



3. Define our principles

Publicly affirm the fundamental principles and standards that are our guide and inspire ethical behavior in the relationship with our customers, suppliers, authorities, civil society organizations, environment, community and everyone who interacts with UPartner Media.



2. WHO WE ARE

This Code of Ethics reflects the way in which we have built our business commitment based on our mission, vision and values, and how we have developed it through fundamental principles of action.



Mission, Vision and Values

Our Mission, Vision and Values, show us the way and set the guidelines to plan strategies and projects aimed at success that, in turn, serve to attract and satisfy the demand of our customers, generate economic value for the company and serve as a constant support for social development.

Mission:

To offer high quality digitalized marketing and communication solutions to our clients, based on ethics and professionalism.

We work to build lasting relationships with them, understanding their needs and offering tailored products and services that allow them to achieve their business objectives.

Vision:

To be drivers of excellence in the marketing and communication market, recognized for the quality of our work, our drive for innovation and our high ethical commitment.

We want to be a benchmark company in the industry, able to contribute to the sustainable development of society through the responsible and effective use of digital tools.

Values:

Responsibility, honesty, empathy, humility, clarity, authenticity, collaboration, co-creation, professionalism, courage, continuous improvement, diversity, equity, respect, integrity, fairness, sustainability, innovation and excellence.

Principles

Principle 1. To ensure regulatory compliance

For UPartner Media, compliance with national and international laws, regulations and best practices applicable at any given time will always be paramount in the development of the business activity over any other consideration, with no exceptions.

We strive to maintain a high level of knowledge and understanding of the regulations that affect us, to constantly adapt to changes and provide quality services to our customers.

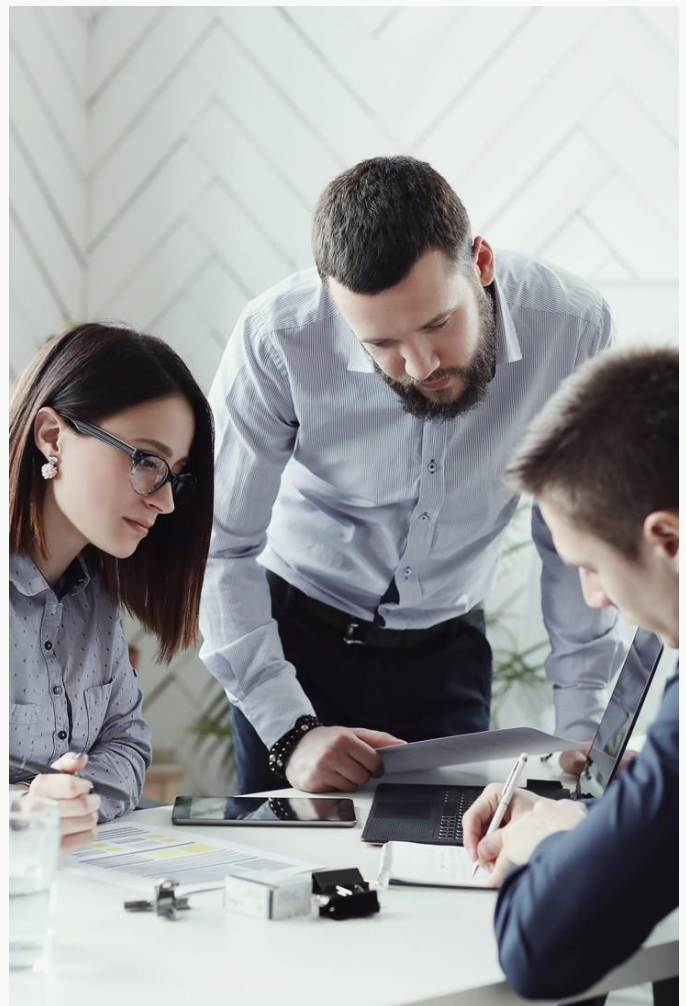
In addition, we are committed to informing and raising awareness among our employees regarding the importance of regulatory compliance and providing them with the necessary training to enable them to adhere to the applicable regulations.

UPartner Media's professionals are required to observe exemplary ethical behavior in all circumstances. To this end, we promote a culture of compliance throughout the organization, encouraging a proactive and responsible attitude towards the identification and prevention of legal risks.

We prioritize transparency and integrity in our relationships with clients, collaborators and suppliers, and we strive to avoid any type of conduct that could jeopardize our reputation or that of our clients.

To this end, we establish clear and transparent procedures in our operations, as well as in the management of relations with third parties. We are also committed to ensuring the continuous optimization of our management and control systems to ensure compliance with all regulations and to maintaining our reputation as an ethical and responsible company.

In short, at UPartner Media we consider regulatory compliance as a responsibility that is shared by all members of the company and a fundamental requirement for the sustainable success of our business.



Principle 2. To act transparently and ensure confidentiality.

For UPartner Media, transparency in stakeholder relations is the basis for building long-term, trust-based relationships.

Our stakeholders, such as customers, suppliers, business partners, collaborators, public administrations and society in general, must be able to trust the truthfulness and integrity of the information we share and publish.

Internally, it is also essential to have reliable and truthful information so that we can make informed decisions and comply with the relevant legislation.

Our books and records must accurately and clearly reflect our transactions, with a reasonable level of detail and in accordance with generally accepted accounting principles and policies.

Although some employees have more specific responsibilities in this area, we all contribute to a greater or lesser extent to the process of properly recording transactions and maintaining records.



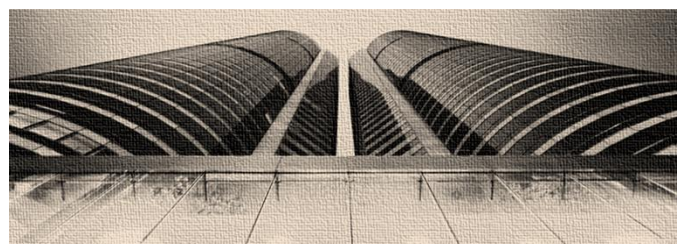
Principle 3. To avoid conflicts of interest

Independence in the exercise of professional activity is the essential basis for a professional practice inspired by freedom of judgment, fairness and loyalty to the company.

As a general principle of action, any UPartner Media employee who finds himself/herself in a potential or actual situation of conflict of interest, considering his/her private or family interests and those of the company, must refrain from exercising the activity that would give rise to such conflict, informing his/her immediate

superior of the characteristics and circumstances of the matter.

Only with the express written authorization of the immediate superior may the employee continue to maintain such situation or carry out the specific activity within his or her professional scope that gives rise to such conflict.



Principle 4. To respect human rights and fundamental freedoms

At UPartner Media, we believe that respect for human rights and fundamental freedoms is essential in our business activities and in our relations with all our stakeholders. For this reason, we fully adhere to the Universal Declaration of Human Rights, with special attention to equal opportunities, whatever the characteristics of individuals, and to the avoidance of child labor and forced labor, as well as respect for the rights of ethnic or indigenous minorities. Likewise, we are fully respectful of the labor rights in force in the countries where we operate.

Our commitment extends to all people, regardless of gender, age, race, ethnicity, sexual orientation, religion or belief, disability or any other condition. We respect and support diversity in all its forms and strive to create an inclusive and safe work environment for all. In addition, we are committed to preventing and avoiding any form of discrimination, harassment or abuse in our work and business relationships.

We promote a culture of respect and tolerance throughout the organization and expect the same from our employees and business partners.

UPartner Media is fully committed to extending this commitment to its business partners and to adopting due diligence measures in the contracting processes and supervision of the execution of its projects in order to identify any risk that may threaten human rights, prevent possible violations and mitigate any impact that may occur.



Principle 5. To foster social responsibility and environmental protection.

UPartner Media integrates social commitment policies focused on responsible management into its own business strategy, where the client is the center of our activity, people are our most important asset and commitment to legality, good governance, social integration, the environment and, in general, the principles of corporate sustainability are part of our business model.

We are aware of our responsibility -individually and collectively- to protect the planet and consider that each of our decisions must take into account the short and medium-term effects on our ecosystem.

To this end, each UPartner Media employee is committed to:

- Give priority to all techniques, methods and equipment, both collective and individual, that promote the saving of natural resources and respect for biodiversity.
- Develop activities that contribute to the use of low-carbon energy.
- Provide services by promoting the circular economy, i.e. promoting that all material used should continue to be a resource instead of becoming waste.
- Report transparently and regularly on our environmental performance in order to foster continuous improvement and accountability.

We believe that our social and environmental responsibility is fundamental to ensuring a sustainable future for our company and for society at large.

Therefore, we will continue to work closely with our employees, customers, suppliers and other stakeholders to promote sustainable and responsible business practices.



A close-up photograph of several hands holding white puzzle pieces against a dark blue background. The hands are positioned as if they are about to assemble the pieces. A semi-transparent blue rectangular box is overlaid on the left side of the image, containing the section header and a paragraph of text.

3.3. RELATIONSHIP WITH OUR STAKEHOLDERS

All members of UPartner Media shall abide by the following standards of conduct in their dealings with our stakeholders.

Relationship with clients

"UPartner Media values customer satisfaction as one of its main objectives, and we strive to establish relationships of trust and collaboration that allow us to grow together."

The company is committed to always respecting the agreed deadlines and budgets, as well as maintaining a professional and courteous manner at all times.

The confidentiality of the information received by the clients will be guaranteed, respecting their intellectual property rights and copyright.

We are fundamentally committed to excellence, personalized management and professional advice through our employees and partners.

Contractual relationships and communications with customers are based on honesty, good faith, trust, transparency, confidentiality and professionalism.

We will avoid commercial practices that involve providing incomplete, ambiguous or misleading information that, by action or omission, may mislead the client as to the characteristics of the services or their suitability.

UPartner Media wants to establish long-lasting and trusting relationships with its clients, based on ethics and excellence in service.

To this end, we strive to understand each client and their specific needs in order to offer them tailor-made solutions that allow them to achieve their business objectives.



Relationship with our team

"Our team is one of our most valuable assets."

We are committed to fostering a healthy and safe working environment, in which mutual respect and collaboration among our collaborators is promoted, ensuring fair and equitable working conditions, providing a safe and healthy workplace environment and promoting a culture of prevention and health care in line with applicable labor regulations and collective bargaining agreements.

It is part of our way of doing things, to enhance teamwork and collaboration between areas and departments, to maximize efficiency and quality in our work, to provide adequate resources and tools for the performance of tasks, and to ensure fair and equitable access to them.

Likewise, as a company, we seek to promote the work-life balance of our employees, offering flexible measures and policies that allow for a balanced management of both areas.

In addition, we are committed to offering training and professional development opportunities to our team, so that they can improve their skills and knowledge and achieve their personal and professional goals, and also to promoting participation in social responsibility and sustainability initiatives and projects, in order to involve our team in the achievement of objectives that are also relevant to the community, society and the environment.

As mentioned above, we value diversity and inclusion in our team, and we strive to promote a work environment free of discrimination or harassment of any kind.



Relationship with our suppliers



"We value our suppliers as strategic partners in the development of our company."

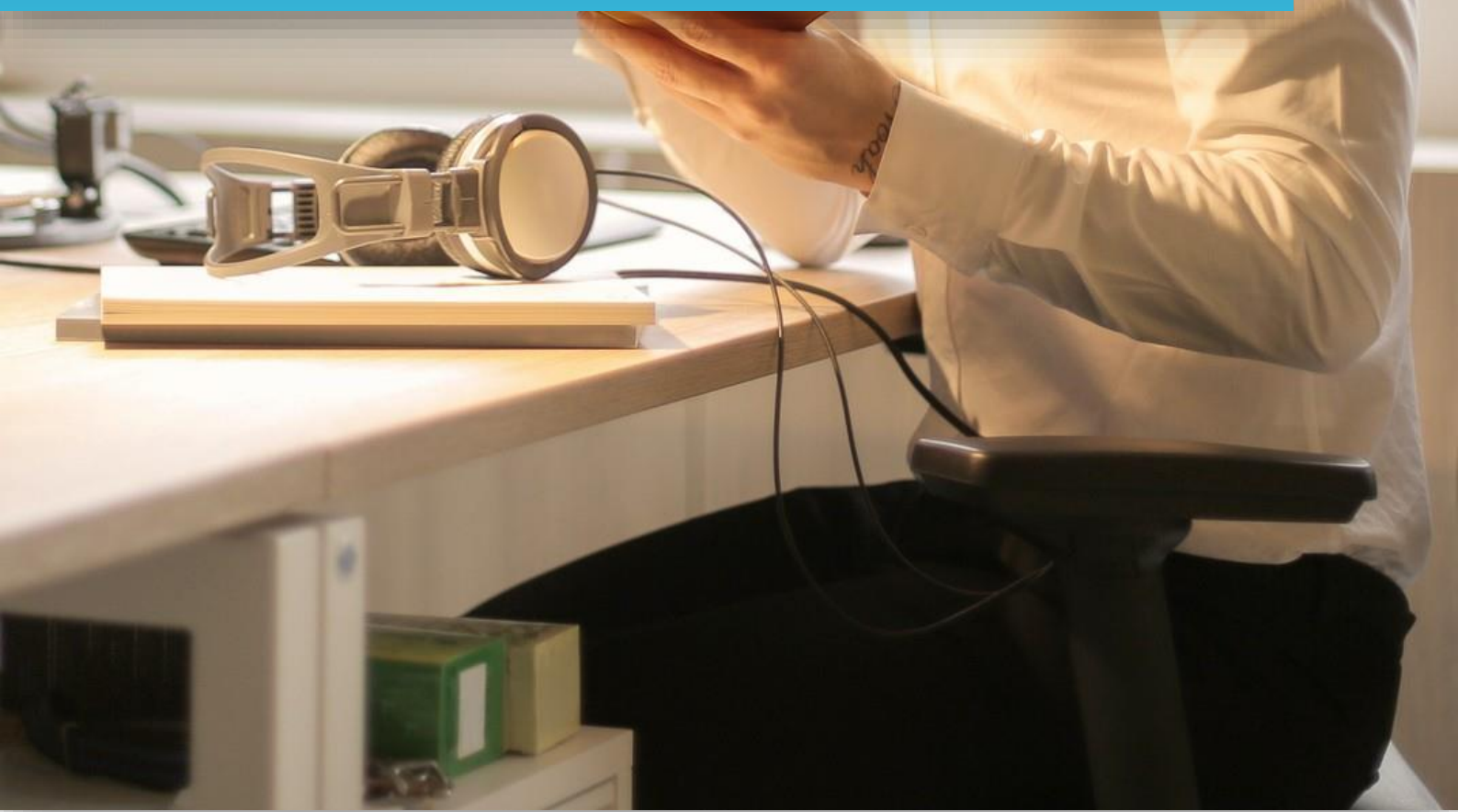
We are committed to establishing collaborative relationships based on trust, honesty, transparency, clarity and mutual respect, while respecting terms and conditions agreed with each supplier.

We will engage suppliers that work in accordance with best practices in ethical, social and environmental issues, as well as good corporate governance.

Suppliers must also respect fundamental human and labor rights in the course of their business and work to extend them to their value chain.



4. HOW TO USE THIS CODE



Action guide

Making the right decision at any given moment is essential to ethical and responsible business conduct. However, there are times when doing the right thing is not easy.

When faced with a complicated situation or a difficult decision to make, we might ask ourselves some of the following questions:

Does it comply with the provisions included in this code?

Is it aligned with UPartner Media's principles?

***Is it legal?
Would I like to have it done to me?***

Would I feel comfortable if this decision I am about to make were made public?

Would my family or colleagues be comfortable with this action or decision?



If the answer to any of the above questions is "no" you should consult or seek advice before making a decision.

Ethics Committee

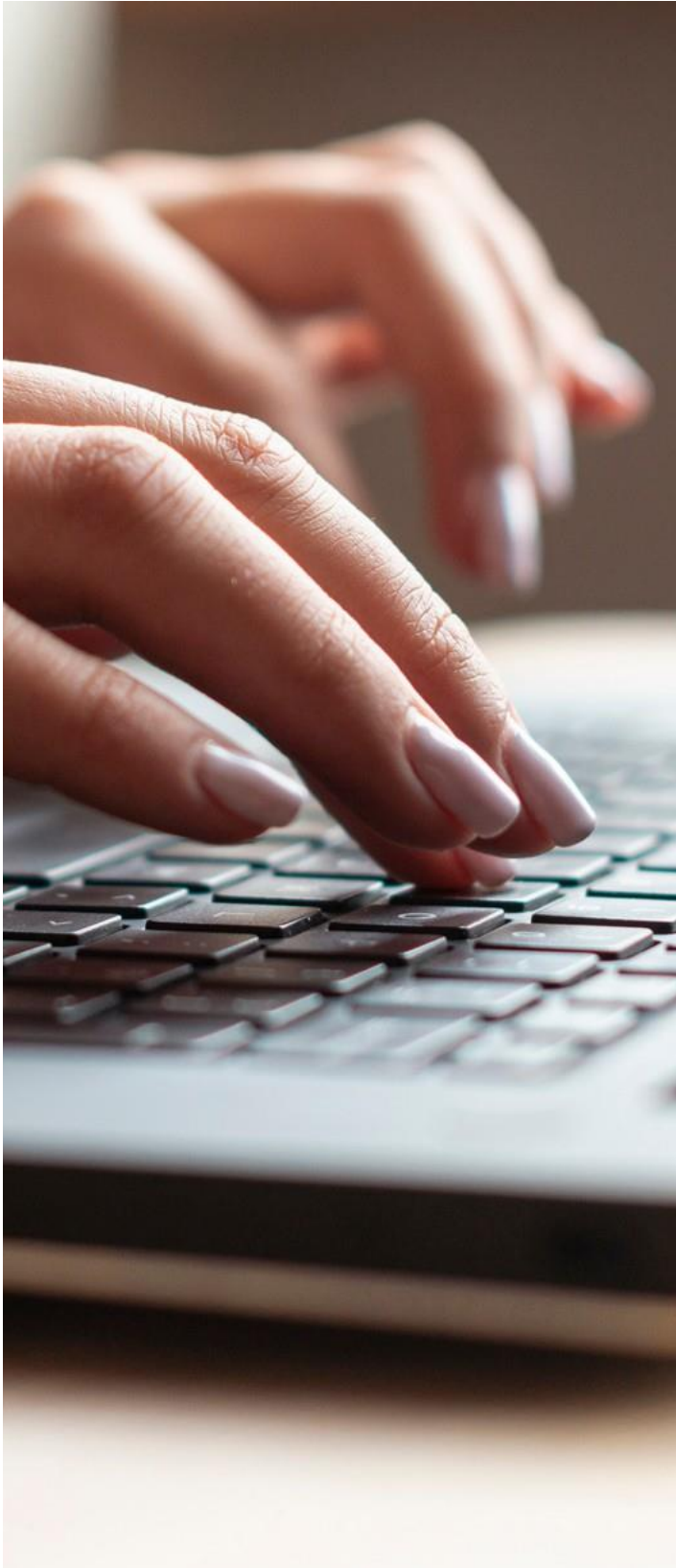


In order to ensure compliance with the Code of Ethics, there will be a UPartner Media Ethics Committee to monitor its implementation.

The Ethics Committee will act independently to ensure the impartiality and consistency of its decisions. It will also be assigned the following functions:

- **Receive and resolve queries related to the application of the code.**
- **To process the communications received, if applicable, until a resolution is issued.**
- **Interpret the Code and evaluate possible violations.**
- **To rule on cases of employment proceedings due to violation of the Code.**
- **Propose to Management any modifications, clarifications and development rules required for the application of the Code.**
- **Regularly prepare reports on the level of compliance with the Code of Ethics, submitting the recommendations it deems necessary to improve its content, facilitate its understanding or ensure its safeguarding.**

Communication procedure



UPartner Media has an Ethics Hotline, a channel of communication with the Ethics Committee to report any irregularities or violations of this Code. This contact channel will be accessible to all managers, employees and collaborators of the company.

The Ethics Hotline will also be used to facilitate the resolution of doubts regarding the interpretation of the Code of Ethics or its practical application by those who are bound by it. The Ethics Line managers can be contacted at the following e-mail address:

lineaetica@upartnermedia.com

Complaints will be resolved using a rigorous, transparent and objective procedure, safeguarding in all cases the confidentiality and anonymity, as appropriate, of the complainant.

In case of violation of the Code of Ethics by any obligated party, UPartner Media will take the measures it deems appropriate in accordance with the current regulatory framework.

Likewise, and without prejudice to the above, the commission of a crime, as well as hindering its discovery or deliberately not reporting it when it comes to our knowledge, shall constitute a very serious misconduct.

Communication procedure

Step 1. Understand

Employees must have a good understanding of the Code in order to make the right decision when faced with a complicated situation.



Step 2. Report

If there is any doubt that a certain situation does not comply with the Code, the best thing to do is to inform the Ethics Committee through the Ethics Hotline.



Step 3. Investigate

The Ethics Committee will review and investigate each case to determine whether a possible violation of the Code of Ethics has occurred.



Step 4. Decide

The Ethics Committee shall decide and take appropriate action in each case and inform all those affected by the misconduct.





Upartnermedia

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